

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES

v.

ANTHONY BUCCI

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No. 04-cr-10194-RCL

DEFENDANT'S REQUESTED QUESTIONS FOR THE JURY VENIRE

The defendant, Anthony Bucci, requests that, in addition to those questions commonly put to the *venire* in cases commenced in this Court, the Court pose the following questions to the prospective jurors in this case:

1. The United States of America is one of the litigants in this trial. You will hear the United States referred to throughout the trial as "the government." Have you, or any member of your immediate family, or anyone with whom you are close:
 - a) ever been employed by the government; specifically by the United States Attorney's Office, the United States Probation Office, the United States Pre-Trial Services Office, the United States District Court Clerk's Office, the United States Marshals Service, or the Drug Enforcement Administration, known as the "DEA"?
 - b) ever been employed by any police department or law enforcement agency?

c) ever had any involvement of any sort with the Malden or Stoneham, Massachusetts police departments or with the Massachusetts State Police?

2. Some of the witnesses expected to be called by the United States at trial are Special Agents of the Drug Enforcement Administration and police officers. These law enforcement officers will be called to testify as to their knowledge of alleged crimes perpetrated by the defendants herein.

a) Are you aware of any bias that you might have in favor of a witness or other individual in this case where that witness or individual is a law enforcement officer or otherwise an employee of the government?

b) Do you believe that law enforcement officers are more believable than witnesses who are not law enforcement officers?

3. Have you, or anyone in your family or close circle of friends ever been treated for an addiction to any narcotic substance?

4. Have you, or anyone in your family or close circle of friends ever been the victim or the defendant in a narcotics related crime?

5. An important legal principle which applies in all criminal trials is that a defendant is presumed to be innocent and that the burden of proving guilt rests with the prosecution. Is there anyone here who questions the wisdom of the presumption of innocence? Is there anyone who thinks that a defendant should put forth at least some evidence of his innocence if he has any such evidence?

6. Another protection provided by our constitution in this country is that a person who is accused of a crime does not have to testify in his or her own

defense. We call this the right to remain silent. Of course, a defendant in a criminal case can testify if he or she wants to, but he does not have to. Is there anyone here who would be skeptical of the innocence of a defendant who decided not to testify at his trial?

Anthony Bucci
By his attorney,

/s/Michael F. Natola

March 8, 2005

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing affidavit has been served the above date, electronically, upon Assistant U.S. Attorney John T. McNeil.

/s/ Michael F. Natola

MICHAEL F. NATOLA